# U.S. Small Business Administration Small Business Procurement Score Card Guidance Attachment 4

Submitted by:

U.S. Department of the Interior Office of Small and Disadvantaged Business Utilization

## Evaluation measure #1 (First Scorecard – Plan)

Implemented strategic plan to increase the value of competitively awarded contracts to small business during the period

## How will SBA evaluate response?

The Agency will need to clearly define and document a strategy to increase competitive opportunities under procurement preference programs.

## Examples:

- Schedule showing an outreach calendar of events, such as vendor outreach session for specific preference groups (e.g. Women-owned small business, service disabled veteran owned small business, HUBZone, etc.,)
- An annual or multi-year plan to increase the number of competitively awarded contracts to small business during the period.
- Yes or No? <u>Yes</u> Agency clearly defined and documented a strategy to increase competitive opportunities under procurement preference programs.

## Brief Agency Comment for Scorecard:

The U.S. Department of the Interior implemented a Strategic Plan that spans the period of FY 2005 through FY 2010. This Plan outlines the Department's outreach and assistance for procurement and contracting opportunities to small, small disadvantaged, women-owned, veteran-owned and service disabled businesses and businesses located in Historically Underutilized Business Zone (HubZone) areas and provides guidance to the Department's contracting and management officials on small business.

In executing our mission, we also focus on policies, programs and outreach events to attract small businesses via targeted socio-economic outreach sessions monthly. Our overall goals are to develop contracting opportunities for small businesses and enhance better relationships with prime contractors that support enhancing contracting opportunities for small businesses.

Internally, the Office of Small and Disadvantaged Business Utilization also teamed with the Office of Property and Acquisition Management to educate and inform program and procurement personnel, procurement and small business specialists on current issues impacting our nation's small business.

**Evaluator Comments:** 

## Brief SBA Comment for Scorecard:

#### Evaluation Measure # 2 (First Scorecard – Plan)

Demonstrated top-level Agency commitment to Small Business Contracting during the period.

## How will SBA evaluate response?

The agency will need to have a documented expression of commitment to small business contracting at the agency-head, or deputy agency-head, level within the previous twelve months.

## Examples:

- Affirmative public statements by senior level executives supporting award of contracts under socioeconomic procurement preference programs.
- Affirmative internal statements by senior level executives encouraging or mandating award of contracts under socioeconomic procurement preference programs.
- Inclusion of such commitment to award of contracts under socioeconomic procurement preference programs in strategic and/or operation plans, and/or annual individual performance work plans; etc.

Yes or No? <u>Yes</u> Agency provided a documented expression of top-level agency commitment.

#### Brief Agency Comment for Scorecard:

Within the last twelve months, the Secretary of the Interior revisited the Department's commitment through a signed document that promoted the Department's Small Business Program. He asked that each Bureau Director fully support the laws and regulations promoting the use of small businesses in acquisition. He encouraged the Department managers to get involved and commit to advancing the Department's Small Business Program.

Moreover, he asked that we open our doors to all small businesses that can supply our needs and avoid unnecessary bundling of Government contracts. Through a unified team of senior management, small business and acquisition personnel, and technical/program staff, he asked that we support both our critical national mission and the important public policy objective of including small businesses in our acquisition program. (Copy of statement attached.)

**Evaluator Comments:** 

#### Brief SBA Comment for Scorecard:

#### Evaluation Measure # 3 (First Scorecard – Plan)

Planned significant events to increase small business participation in the procurement process during the period.

#### How will SBA evaluate response?

The agency will need to have enacted a comprehensive small business plan that includes written policies and procedures focused on improving the competitive environment and increasing small business participation in the procurement process.

## Examples:

- Plans to sponsor relevant outreach events or educational activities.
- Plans to implement a relevant supplemental small business policy or procedure.
- Plans to work with SBA on Small Business matchmaking events for members of socioeconomic preference programs such as women-owned small businesses, service-disabled veterans-owned small businesses, and HUBZone certified firms.
- Yes or No? Yes Agency clearly enacted a comprehensive small business program.

# Brief Agency Comment for Scorecard:

The Department of the Interior has a comprehensive small business "living" plan that outline performance measures, successes and/or failures of obtaining the desired results and alternatives for correcting performance deficiencies.

As an ongoing practice, the Office of Small and Disadvantaged Business Utilization provides outreach and assistance for procurement and contracting opportunities to small, small disadvantaged, women-owned, veteran-owned and service disabled businesses and businesses located in Historically Underutilized Business Zone (HubZone) areas.

Our goal is to increase the number of workshops and conference participation that will benefit our stakeholders. This will enhance relationships with program managers and senior officials in order to build relationships for small businesses.

**Evaluator Comments:** 

#### Brief SBA Comment for Scorecard:

#### Evaluation Measure # 4 (First Scorecard – Plan)

Demonstrates that small business data is accurately reported in FPDS-NG during the period.

## House will SBA evaluate response?

The agency will need to have established and documented the plan to ensure that small business data is accurately reported in FPDS-NG.

#### Examples:

- Plan to verify and validate FPDS-NG data, pursuant to Office of Federal Procurement Policy Memorandum of March 9, 2007, entitled <u>Federal</u> Procurement Data Verification and Validation.
- Plans to encourage business to update their CCR information to accurately reflect

size and social-economic business status.

• Yes or No <u>Yes</u> Agency has established and documented a process to ensure that small business data is accurately reported in FPDS-NG.

## Brief Agency Comment for Scorecard:

The U.S. Department of the Interior's Property and Acquisition Management and the Small and Disadvantaged Business Utilization Offices work collectively to verify and validate FPDS-NG data. This is ongoing process but the percentage errors have been reduced in accordance with the Office of Federal Procurement Policy Memorandum of March 9, 2007.

**Evaluator Comments:** 

#### Brief SBA Comment for Scorecard:

## Evaluation Measure # 5 (First Scorecard – Plan)

Demonstrates that polices and procedures are in place to ensure compliance with subcontracting plans and attainment of subcontracting goals during the period.

## How will SBA evaluate response?

The agency will need to have established, documented, and enacted a systematic plan to enforce small business subcontracting plans and to meet subcontracting goals.

## Examples:

- Plans to use the Electronic Subcontracting Reporting System (eSRS) to manage compliance with subcontracting goals and to ensure attainment of subcontracting goals.
- Plans to provide assistance and support to prime contractors to ensure compliance with subcontracting plans.

Yes or No <u>Yes</u> The Agency has established, documented, and enacted systematic plan to enforce small business subcontracting plans and to meet subcontracting goals.

## Brief Agency Comment for Scorecard:

The Department of the Interior has processes in place to conduct internal reviews to identify best practices in the Department Small Business Program. In addition to these processes, Bureaus and Offices' compliance with the small business subcontracting plans and goals are monitored and enforced by the contracting Officers and Small Business Specialists.

The eSRS is the avenue that the Departments uses to require submission of the subcontracting data.

Evaluator Comments:

#### Brief SBA Comment for Scorecard:

#### Evaluation Measure # 6 (First Scorecard – Plan)

Demonstrated unjustified bundling has taken place during the period

How will SBA evaluate response:

The agency will need to have established, documented, and enacted systematic action plans to be taken to ensure no unjustified bundling has taken place during the reporting period.

#### Examples:

- Plan to improve bundling activities review process.
- Plan to review FPDS-NG for all agency bundling coded.
- Yes or No? <u>Yes</u> The Agency has established documented and enacted systematic actions to be taken to ensure no unjustified bundling has taken place during the reporting period.

## Brief Agency Comment for Scorecard:

The Office of Small and Disadvantaged Business Utilization conducts ongoing reviews of large contracts to ensure that unjustified bundling has not been proposed. We work closely with the Department's Property and Assessment Management Office to develop strategies where savings can be obtained through strategic sourcing initiatives that do not excludes small businesses.

## We have stipulated that --

- Small business specialists must coordinate on acquisition strategies for contracts of \$2 million and above (unless reserved or set aside for small business); and must notify the Office of Small and Disadvantaged Business Utilization when they identify bundling that is unnecessary, unjustified, or not identified as such.
- Contracting officers must provide a Bundling Justification document to the Office of Small and Disadvantaged Business Utilization when substantial bundling is involved (i.e., contracts of \$2 million or more).
- The Office of Small and Disadvantaged Business Utilization must conduct annual reviews to assess: 1) the adequacy of bundling documentation and justifications; 2) the actions taken to mitigate the effects of contract bundling on small business; and 3) the extent to which small businesses are receiving a fair share of the Department's contracts.

#### **Evaluator Comments:**

#### Brief SBA Comment for Scorecard:

## Evaluation Measure #7 (First Scorecard – Plan)

Planned training to contracting staff/managers in executing small business/socioeconomic procurements during the period.

## How will SBA evaluate response?

The agency will need to have planned at least 1 training session for the reporting period.

Acceptable responses may include, but need not be limited to the following:

- Maintenance of educational Intranet sites on small business programs covering program direction, critical documents, links to laws, regulations, and external contracting tools and resources.
- Plans to implement small business program orientation and training especially focusing on socioeconomic procurement preference programs such as womenowned small business, service-disabled veteran-owned small business, and HUBZone certified firms.

Yes or No? <u>Yes</u> The Agency has plan training for contracting staff/managers in executing small business/socioconomic procurements.

## **Brief Agency Comment for Scorecard:**

The Office of Small and Disadvantaged Business Utilization utilizes the Department of the Interior's website to ensure current information is made available to small business specialists, the Department's procurement community and external businesses. Via this website, we are linked to small business outreach activities, laws, regulations and tools that assist with the enrichment of our program.

As a part of these web-based opportunities, a number of staff persons from the Office of Small and Disadvantaged Business Utilization provide ongoing training and skill development that equip the contracting staff and managers to ensure an increase in the participation of small businesses in prime and subcontract opportunities.

**Evaluator Comments:** 

## Brief SBA Comment for Scorecard:

## Evaluation Measure # 8 (First Scorecard – Plan)

Planned to collaborate with SBA on formulation of small business procurement policy initiatives during the period.

## How will SBA evaluate response?

The agency will need to demonstrate its intent to collaborate with SBA on at least one small business policy initiative during the reporting period.

Acceptable responses may include, but need not be limited to the following:

• Active participation in the Small Business Procurement Advisory Council small business procurement policy discussions.

Yes or No? <u>Yes</u> The Agency has planned to collaborate with SBA on formulation of small business procurement policy initiatives during the period.

# Brief Agency Comment for Scorecard:

During this reporting period, the Office of Small and Disadvantaged Business Utilization collaborated with the Office of Veterans Procurement Liaison on how to enhance the Service Disabled Veterans Program. We have met with Billy Jenkins and held a number of conference calls regarding this matter. We are now extending an invitation to him to join us for our 2008 Business Integration Conference to be held in Cambridge, Maryland, from March 31 through April 3, 2008.

Also, we have another opportunity to invite an SBA representative to join us this conference as well to discuss the SBA 8(a) partnership agreement.

**Evaluator Comments:** 

#### Brief SBA Comment for Scorecard:

## Evaluation Measure # 9 (First Scorecard – Plan)

Agency submits all strategic plans and reports that became due to SBA during the reporting period.

# How will SBA evaluate response?

In order to receive credit for this element, the agency will need to have met 100% of deadlines for all required strategic plans and annual reports that were due to SBA, within the reporting period. (That is, from October 1, 2007 through the date of submission of the First Scorecard Report to SBA. See Attachment.)

• Yes or no? <u>Yes</u> Agency has met 100% of deadlines for all required strategic plans and annual reports that were due to SBA.

(See attachment 6, Mandatory Agency Reports Due to SBA)

Based on the reporting period of October 1, 2007 through the date of this submission, the Department of the Interior was required to submit only one report.

However, we have a number of problems accessing the system so we have been delayed in submitting the Competitive Demonstration Program Report.

The report will be submitted under separate cover.

Brief Agency Comment for Scorecard:

**Evaluator Comments:** 

Brief SBA Comment for Scorecard: